

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. 08 CR 282
v.)	
)	
DANA DORCAS,)	Judge Blanche Manning
)	
Defendant.)	

**PETITIONER DANA DORCAS'S AGREED MOTION FOR
PERMISSION TO LEAVE THE JURISDICTION**

Petitioner, Dana Dorcas, by his attorney, Thomas More Leinenweber, respectfully moves this Court for an order allowing Mr. Dorcas to leave the Northern District of Illinois to travel to Knoxville, Tennessee to visit his father. In support thereof, Mr. Dorcas states as follows:

1. Petitioner Dana Dorcas has been charged with one count of bank robbery and is currently free on bond. He has a change of plea date set for August 19, 2008.
2. Petitioner's father, Dana Dorcas, Sr., resides in Knoxville, Tennessee and Petitioner wishes to visit him for the Labor Day weekend of August 29 through September 2, 2008.
3. Petitioner currently is working as a waiter at Mimi's Café in Naperville, Illinois and has had no issues with pretrial services since his release.
4. Petitioner's pretrial services officer, Krista Brown, has no objection to Petitioner's motion.
5. The Assistant United States' Attorney in this matter, Shana Gillers, likewise has no objection.

WHEREFORE, Petitioner Dana Dorcas respectfully requests that this Honorable Court allow him leave the continental United States to travel to travel to Knoxville, Tennessee from August 29, 2008 through and including September 2, 2008.

Respectfully submitted,

By: Thomas More Leinenweber
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